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CATHERINE J. KEUTHEN
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December 12, 2024

Andrew Greene, Director
Energy Facilities Siting Board
One South Station
Boston, MA 02110

Re: New England Power Company d/b/a National Grid, EFSB 24-02

Dear Mr. Greene:

Enclosed are two copies of a petition by New England Power Company d/b/a National Grid (“NEP” or the “Company”), pursuant to G.L. c. 164, § 69J (“Section 69J Petition”), seeking approval from the Energy Facilities Siting Board (the “Siting Board”) to construct, operate and maintain a new overhead transmission line in Palmer, West Brookfield and Ware that will replace an existing transmission line in the same right-of-way. The Company also plans to remove the existing transmission line and to construct, reestablish and improve access routes. This work is referred to herein as the “Palmer to Ware Improvement Project” or the “Project.”

Attachment A to the Section 69J Petition, entitled *Palmer to Ware Improvement Project Application* (the “Application”), includes: (1) a detailed description of the Project; (2) an analysis of the need for the Project; (3) an evaluation of the alternatives to the Project and its routing; and (4) an extensive review of the Project’s environmental impacts and proposed mitigation measures and (5) a demonstration that the Project is consistency with the current health, environmental protection and resource use and development policies of the Commonwealth. In accordance with G.L. c. 164, § 69J and Siting Board precedent and standards, the Petition demonstrates that the Project will ensure a reliable supply of energy for the Commonwealth with the least environmental impact and at the lowest possible cost.

In connection with the Section 69J Petition, the Company is filing with the Department of Public Utilities (the “Department”) a petition pursuant to G.L. c. 164, § 72 (the “Section 72 Petition”). In order to ensure a coordinated and timely review of the interrelated petitions, the Company requests that the Department refer to the Siting Board the Section 72 Petition and that the Siting Board accept it for a consolidated review in one proceeding. In furtherance, a Motion to Consolidate the two petitions is enclosed. Finally, notices of appearance of counsel and a consolidated Draft Notice of Public Hearing are enclosed.

Letter to Andrew Greene
December 12, 2024
Page 2

The Company has forwarded a copy of the Petition to municipal officials in Palmer, West Brookfield and Ware.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Catherine Keuthen".

Catherine Keuthen

Enclosures

cc:

Joan Foster Evans, General Counsel, Energy Facilities Siting Board (by email)
David B. Lyons, General Counsel, Department of Public Utilities (by email)
Mark Marini, Secretary, Department of Public Utilities (by email)

**COMMONWEALTH OF MASSACHUSETTS
ENERGY FACILITIES SITING BOARD**

Petition of New England Power Company d/b/a
National Grid Pursuant to G.L. c. 164, § 69J for
Approval to Construct, Operate and Maintain an
Overhead Transmission Line

EFSB 24-02

**PETITION OF NEW ENGLAND POWER COMPANY d/b/a NATIONAL GRID
PURSUANT TO G.L. c. 164, § 69J FOR APPROVAL TO CONSTRUCT, OPERATE AND
MAINTAIN AN OVERHEAD TRANSMISSION LINE**

I. INTRODUCTION

Now comes New England Power Company d/b/a National Grid (“NEP” or the “Company”) and hereby petitions the Energy Facilities Siting Board (the “Siting Board”) pursuant to G.L. c. 164, § 69J for approval to construct, operate and maintain an overhead transmission line in the towns of Palmer, West Brookfield and Ware, Massachusetts (the “Palmer to Ware Improvement Project” or the “Project”). The Project includes the removal of the existing transmission line and the construction, reestablishment and improvement of access routes. The new transmission line (“Rebuilt Line”) will replace the Company’s existing 69 kV O15N overhead transmission line (the “O15N Line”) in the same right-of-way (“ROW”) as the existing O15N Line (“Existing Line”). The Existing Line must be rebuilt because inherent design characteristics and physical deterioration have resulted in poor reliability. Rebuilding the Existing Line will address widespread damage to the existing structures, improve telecommunications between the two substations, and improve reliability. Although NEP will operate the Rebuilt Line at 69 kV, the Company proposes to construct the transmission structures to the Company’s 115 kV design standards for future use, which will provide both short- and long-term reliability benefits. In support of this Petition, NEP respectfully represents as follows:

1. NEP, a Massachusetts corporation, is an “electric company” as defined by G.L. c. 164, § 69G and is subject to the provisions of G.L. c. 164, §§ 69H-69R. New England Power Company d/b/a National Grid, EFSB 19-04/D.P.U. 19-77/19-78, at 118 (2021) (“NEP Beverly-Salem”); New England Power Company d/b/a National Grid, EFSB 12-1/D.P.U. 12-46/47 (2014) (“NEP IRP”); New England Power Company d/b/a National Grid, EFSB 13-2/D.P.U. 13-151/152 (2014) (“NEP Salem”).

2. NEP is represented in this proceeding by Mark Rielly, Esq., Assistant General Counsel and Director, National Grid, 170 Data Drive, Waltham, Massachusetts 02451 and Catherine J. Keuthen, Esq. and Cheryl A. Blaine, Esq., of Keegan Werlin LLP, 99 High Street, Suite 2900, Boston, Massachusetts 02110.

3. Pursuant to G.L. c. 164, § 69J, an electric company seeking to construct a “facility” must obtain approval from the Siting Board. Pursuant to G.L. c. 164, § 69G, a jurisdictional facility is defined as a “a new electric transmission line having a design rating of 115 kilovolts or more which is 10 miles or more in length on an existing transmission corridor except reconductoring or rebuilding of transmission lines at the same voltage.” The Rebuilt Line will extend approximately 10.35 miles in Massachusetts along an existing transmission corridor and will have a design rating of 115 kV. Accordingly, the Project is subject to the Siting Board’s jurisdiction under Section 69J.

4. Simultaneously herewith, NEP is filing with the Department of Public Utilities (the “Department”) a petition requesting approval of the Project in accordance with G.L. c. 164, § 72 (the “Section 72 Petition”) (D.P.U. 24-190).

5. The Company is also filing motions with the Department and the Siting Board requesting the referral of the Section 72 Petition to the Siting Board and the consolidation of

these related petitions into one proceeding for the Siting Board's review. G.L. c. 25, § 4; G.L. c. 164, § 69H; NSTAR Electric Company d/b/a Eversource Energy, EFSB 22-03/D.P.U. 22-21 (2024) ("NSTAR GSEP") at 6, NEP Beverly-Salem at 6; NEP IRP at 3; NEP Salem at 3.

6. The Company incorporates by reference the Section 72 Petition, including all attachments thereto, into this Section 69J Petition.

II. PROJECT DESCRIPTION

7. The Palmer to Ware Improvement Project includes construction of the Rebuilt Line and the removal of the Existing Line, both located or to be located on an existing NEP ROW that extends from NEP's Ware #501 Substation in Ware, Massachusetts ("Ware Substation") and NEP's Palmer #503 Substation in Palmer, Massachusetts ("Palmer Substation").¹

8. The Palmer to Ware Improvement Project is more specifically described in Section 1.0 of the *Palmer to Ware Improvement Project Application* (the "Application"), provided as Attachment A hereto.

III. STANDARD OF REVIEW

9. In accordance with Section 69J, before approving a petition to construct a proposed energy facility, the Siting Board requires an applicant to justify its proposal in four phases. First, the Siting Board requires the applicant to show that additional energy resources are needed (see Application, Section 2). Second, the Siting Board requires the applicant to establish that, on balance, its proposed project is superior to alternative approaches in terms of reliability, cost and environmental impact, and in its ability to address the identified need (see Application,

¹ While NEP does not concede that the removal of the Existing Line meets the definition of "facility" under G.L. c. 164, § 69G(2), the Company wishes to facilitate the Siting Board's review and demonstrate its willingness to undergo a rigorous review of the Project. Accordingly, the Company has prepared this Petition on an integrated and consolidated basis, addressing all related impacts, costs and other topics and requesting all approvals which the Siting Board may view as applicable to the Project.

Section 3). Third, the Siting Board requires the applicant to show that it has considered a reasonable range of practical facility siting alternatives to ensure that no clearly superior route, in terms of cost, environmental impact and reliability, was overlooked (see Application, Sections 4 and 5). Finally, the applicant must show that its plans for construction of new facilities are consistent with the current health, environmental protection and resource use and development policies as developed by the Commonwealth (see Application, Section 6). As demonstrated in the Application, the Project satisfies the Siting Board's standards and relevant precedent for jurisdictional facilities.

A. The Project is Needed.

10. Section 69J provides that the Siting Board should approve a petition to construct if it determines that the plans for the construction of the applicant's facilities are consistent with the policies stated in G.L. c. 164, § 69H to provide a reliable energy supply for the Commonwealth with a minimum impact on the environment at the lowest possible cost. In carrying out its statutory mandate with respect to proposals to construct energy facilities in the Commonwealth, the Siting Board evaluates whether there is a need for additional energy resources to meet: (1) reliability objectives; (2) economic efficiency objectives; or (3) environmental objectives. NSTAR GSEP at 15; NEP Beverly-Salem at 10; NEP IRP at 4-5; NEP Salem at 5-6. The need for a particular facility can be demonstrated by showing need on any (or all) of those three bases. See NEP IRP at 4-5; NEP Salem at 5-6.

11. To ensure reliability, each transmission and distribution company establishes and applies planning criteria for construction, operation, and maintenance of its transmission and distribution system. NSTAR GSEP at 15; NEP Beverly-Salem at 10; NEP IRP at 5; NEP Salem at 6. Compliance with the applicable planning criteria can demonstrate a "reliable" system. Id.

To determine whether system improvements are needed, the Siting Board: (1) examines the reasonableness of the Company's system reliability planning criteria; (2) determines whether the Company uses reviewable and appropriate methods for assessing system reliability over time based on system modeling analyses or other valid reliability indicators; and (3) determines whether the relevant transmission and distribution system meets these reliability criteria over time under normal conditions and under reasonable contingencies, given existing and projected loads. NSTAR GSEP at 15; NEP Beverly-Salem at 10; NEP IRP at 5; NEP Salem at 6-7.

12. The Company's review of the recent operating history, design, and physical condition of the Existing Line demonstrates that it should be rebuilt to ensure reliable service. As discussed in Section 2 of the Application, not only do the Existing Line's wooden structures have widespread damage caused by woodpecker activity, but broader physical issues have contributed to its poor performance, including the off-center location of the transmission line in the ROW, the proximity of tall trees along the ROW, and poor shielding angles when compared to industry standard. The Rebuilt Line will: (1) address the condition of the Existing Line to improve its performance and increase reliability of service; (2) increase fiber optic capability to both protect the line from lightning and improve telecommunications; and (3) provide flexibility in meeting future transmission system needs.

B. The Company Considered Alternatives to the Project.

13. The Siting Board is required to evaluate proposed projects to ensure a reliable energy supply for the Commonwealth with a minimum impact on the environment at the lowest possible cost. See G.L. c. 164, § 69H. In addition, Section 69J requires a proposed project proponent to present alternatives to the proposed facility, which may include: (a) other methods of transmitting or storing energy; (b) other sources of electrical power or natural gas; or (c) a

reduction of requirements through load management. NSTAR GSEP at 30; NEP Beverly at 17; NEP IRP at 25-26; NEP Salem at 17-18.

14. In implementing its statutory mandate, the Siting Board requires a petitioner to show that, on balance, its proposed project is superior to alternative approaches in terms of reliability, cost, environmental impact, and ability to meet a previously identified need. NSTAR GSEP at 30; NEP Beverly at 17; NEP IRP at 25-26; NEP Salem at 17-18. In addition, the Siting Board requires a petitioner to consider reliability of supply as part of its showing that the proposed project is superior to alternative project approaches. Id.

15. The Company comprehensively identified and analyzed various Project alternatives to address the established need for an additional energy resource, including: (1) a no-build alternative; (2) non-wires alternatives; (3) a partial rebuild alternative; (4) a complete rebuilding of the Existing Line (the Project). The Company's proposed Project, rebuilding the Existing Line, best meets the needs identified in Section 2 of the Application while balancing reliability, cost, and environmental considerations.

16. After determining that the Project was the superior alternative for meeting the identified need, NEP considered two transmission structure design alternatives: one that complies with NEP's 115 kV design standards, and a second that complies with NEP's 69 kV design standards. The Company concluded that rebuilding the Existing Line in the existing ROW using its 115 kV structure design would best address the identified needs at a low cost while minimizing environmental impacts. It would also provide NEP with the flexibility to adapt its transmission network to future demands without undertaking costly upgrades that result in further impacts at a later date. The Company's analysis of Project alternatives is described in Section 3 of the Application.

C. The Company Properly Evaluated Alternative Routes.

17. Section 69J requires the Siting Board to review alternatives to planned projects, including “other site locations.” In implementing this statutory mandate, the Siting Board requires a petitioner to demonstrate that it has considered a reasonable range of practical siting alternatives and that the proposed facilities are sited at locations that minimize costs and environmental impacts while ensuring supply reliability. NSTAR GSEP at 37; NEP Beverly at 29; NEP IRP at 41-42; NEP Salem at 34-35. To do so, an applicant must satisfy a two-pronged test: (1) the applicant must first establish that it developed and applied a reasonable set of criteria for identifying and evaluating alternative routes in a manner that ensures that it has not overlooked or eliminated any routes that, on balance, are clearly superior to the proposed route; and (2) the applicant must establish that it identified at least two noticed sites or routes with some measure of geographic diversity. Id.

18. The Siting Board has also stated that, while it has required past applicants to provide a noticed alternative route for their proposals, the practice of doing so is not mandated by Section 69J and the Siting Board has accepted that a noticed alternative route may not be warranted in all cases. Colonial Gas Company d/b/a National Grid, EFSB 18-01/D.P.U. 18-30, at 40-41 (2019) (“National Grid Lowell”); Colonial Gas Company d/b/a National Grid, EFSB 16-01, at 28 (2016) (“National Grid Mid Cape”).

19. The Company undertook a thorough and objective analysis to determine if the proposed route along the Existing Line corridor best balanced considerations of reliability, and minimization of environmental impacts and costs. The Company’s analysis compared potential routing alternatives and demonstrated that the Existing Line corridor offers clear advantages because of the need to maintain reliable delivery of electricity to customers served by the Palmer

and Ware Substations. In addition, alternative routes would result in increased costs, schedule delays, and new and/or increased impacts to human and natural environments. Accordingly, the Company determined that specifying a noticed alternative route was not warranted in this instance because all of the alternative routes considered by the Company were substantially inferior from a cost and environmental impact perspective than rebuilding the Existing Line on the same ROW. Moreover, noticing an alternative route that provides no benefit has the potential to raise unnecessary concern among a new set of abutters. As such, the Company is presenting a single route option for the Project. The routing alternatives studied by the Company are more particularly described in Section 4 of the Application.

D. Environmental Impacts, Cost and Reliability of the Project Have Been Appropriately Evaluated.

20. In implementing its statutory mandate under G.L. c. 164, §§ 69H, 69J, the Siting Board requires a petitioner to show that its proposed facility is sited at a location that minimizes costs and environmental impacts while ensuring a reliable energy supply. NSTAR GSEP at 102; NEP Beverly at 41; National Grid Lowell at 42; National Grid Mid Cape at 29.

21. An assessment of all impacts of a proposed facility is necessary to determine whether an appropriate balance is achieved both among conflicting environmental concerns as well as among environmental impacts, cost and reliability. NSTAR GSEP at 103; NEP Beverly at 41-42. A facility that achieves that appropriate balance meets the Siting Board's statutory requirement to minimize environmental impacts at the lowest possible cost. NEP Beverly at 41-42; NEP IRP at 46-47; NEP Salem at 39.

22. The Siting Board first determines if the petitioner has provided sufficient information regarding environmental impacts and potential mitigation measures to enable the Siting Board to determine whether a petitioner has achieved the proper balance among various

environmental impacts and among environmental impacts, cost and reliability. NSTAR GSEP at 102-103; NEP Beverly at 41-42.

23. The Siting Board then examines the environmental impacts, reliability and cost of the proposed facilities to determine whether: (1) environmental impacts would be minimized; and (2) an appropriate balance would be achieved among conflicting environmental impacts as well as among environmental impacts, cost and reliability. NSTAR GSEP at 103; NEP Beverly at 42; NEP IRP at 73; NEP Salem at 89-90.

24. The Company conducted a comprehensive analysis of the environmental impacts of the Project and has appropriately minimized and mitigated the environmental impacts associated with the construction and operation of the Project. The Project will also achieve an appropriate balance among conflicting environmental concerns as well as among environmental impacts, reliability and cost. The cost, reliability and environmental impacts analyses are set forth in Section 5 of the Application.

E. The Project Meets the Siting Board's Consistency Standards in Accordance with Precedent.

25. Section 69J states that the Siting Board shall approve a petition to construct a facility if it determines that “plans for expansion and construction of the applicant’s new facilities are consistent with current health, environmental protection, and resource use and development policies as adopted by the commonwealth.”

26. The Project is necessary to ensure the reliable supply of electricity to customers in thirteen communities in central Massachusetts. Section 6 of the Application demonstrates that the construction and operation of the Project is consistent with current health, environmental protection and resource use and development policies as adopted by the Commonwealth of Massachusetts.

WHEREFORE, the Petitioner respectfully requests that the Siting Board, pursuant to G.L. c. 164, § 69J, conduct a public hearing on this Petition (and on any matter referred to the Siting Board from the Department) and take such other action as may be necessary to: (i) grant the authority to construct the Project as more particularly described in the attached Application; (ii) find that the construction of the Project is consistent with current health, environmental, and resource use and development policies as adopted by the Commonwealth of Massachusetts and the policies stated in G.L. c. 164, § 69H; and (iii) find that such construction is required in order to provide a necessary energy supply for the Commonwealth with a minimum impact on the environment at the lowest possible cost.

Respectfully Submitted,

**NEW ENGLAND POWER COMPANY
d/b/a NATIONAL GRID**

By its attorneys,



Mark Rielly, Esq.
New England Power Company d/b/a National Grid
170 Data Drive
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(781) 902-4208



Catherine J. Keuthen, Esq.
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Dated: December 12, 2024

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| Petition of New England Power Company d/b/a |) | EFSB 24-02 |
| National Grid Pursuant to G.L. c. 164, § 69J for |) | |
| Approval to Construct, Operate and Maintain a |) | |
| New Overhead Transmission Line |) | |
| |) | |
| Petition of New England Power Company d/b/a |) | D.P.U. 24-190 |
| National Grid Pursuant to G.L. c. 164, § 72 for |) | |
| Approval to Construct, Operate and Maintain a |) | |
| New Overhead Transmission Line |) | |
| |) | |

Now comes New England Power Company d/b/a National Grid (“NEP” or the “Company”) seeking consolidation of the above-captioned proceedings by the Energy Facilities Siting Board (“Siting Board”) for review. In support thereof, the Company state as follows:

1. On this date, NEP filed a petition with the Department of Public Utilities (the “Department”), pursuant to G.L. c. 164, § 72, seeking a determination that the proposed, new double circuit overhead transmission line in Palmer, West Brookfield and Ware (the “Palmer to Ware Improvement Project” or the “Project”) will replace an existing transmission line in the same right-of-way is necessary, serves the public convenience and is consistent with the public interest (the “Section 72 Petition”) (D.P.U. 24-190).

2. Also on this date, NEP filed with the Siting Board a petition for approval of the Project pursuant to G.L. c. 164, § 69J (the “Section 69J Petition”) (EFSB 24-02).
3. Consistent with Department precedent, NEP filed a motion with the Department requesting that the Section 72 Petition be referred to the Siting Board. By this Motion to the Siting Board, the Company is requesting that the Section 69J Petition and the Section 72 Petition be consolidated for review and issuance of an order by the Siting Board. New England Power Company d/b/a National Grid, EFSB 13-2/D.P.U. 13-151/13-152, at 3 (2014); NSTAR Electric Company, EFSB 10-2/D.P.U. 10-131/10-132, at 2 (2012).
4. Consolidation of these matters is contemplated by G.L. c. 25, § 4, which states: “In order to promote efficiency in administration... [the chairman of the Department] may refer matters related to the need for, construction of, or siting of facilities, as defined in section sixty-nine G of chapter one hundred and sixty-four, as [the chairman] deems appropriate to the [Siting Board] in accordance with section 69H of chapter one hundred and sixty-four.” Similarly, G.L. c. 164, § 69H states that the Siting Board may “accept for review and approval or rejection any application, petition, or matter related to the need for, construction of, or siting of facilities referred to the chairman of the [D]epartment pursuant to section four of chapter twenty-five.”
5. Similarly, the Department “may order proceedings involving a common question of law or fact to be consolidated for hearing on any or all of the matters in issue in such proceedings.” 220 C.M.R. § 1.09.

6. The Project meets the standards of the Siting Board and Department under G.L. c. 164, §§ 69J and 72, respectively, because these facilities are: (a) necessary to ensure a reliable energy supply with a minimum impact on the environment at the lowest possible cost; and (b) needed and will serve the public interest
7. Both petitions involve common questions of law and fact, and consolidation of the proceedings would further the interests of administrative efficiency.

WHEREFORE, NEP respectfully requests that the Siting Board consolidate the Section 72 Petition with the Section 69J Petition.

Respectfully Submitted,

**NEW ENGLAND POWER COMPANY
d/b/a NATIONAL GRID**

By its attorneys,



Mark Rielly, Esq.
National Grid USA Service Company, Inc. d/b/a
National Grid
170 Data Drive
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-and-



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Dated: December 12, 2024

COMMONWEALTH OF MASSACHUSETTS

ENERGY FACILITIES SITING BOARD
DEPARTMENT OF PUBLIC UTILITIES

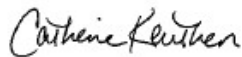
Petition of New England Power Company d/b/a
National Grid Pursuant to G.L. c. 164, § 69J for
Approval to Construct, Operate and Maintain a
New Double Circuit Overhead Transmission Line
and Two Associated Tap Lines

EFSB 24-02
D.P.U. 24-190

APPEARANCE OF COUNSEL

We, Catherine J. Keuthen and Cheryl A. Blaine, hereby appear for and on behalf of New England Power Company d/b/a National Grid in the above-captioned proceeding.

Respectfully Submitted,



Catherine J. Keuthen, Esq.
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Dated: December 12, 2024

COMMONWEALTH OF MASSACHUSETTS

**ENERGY FACILITIES SITING BOARD
DEPARTMENT OF PUBLIC UTILITIES**

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| Approval to Construct, Operate and Maintain a |) | EFSB 24-02 |
| New Double Circuit Overhead Transmission Line |) | D.P.U. 24-190 |
| and Two Associated Tap Lines |) | |
| |) | |

APPEARANCE OF COUNSEL

I, Mark Rielly, hereby appear for and on behalf of New England Power Company d/b/a National Grid in the above-captioned proceedings.

Respectfully Submitted,

**NEW ENGLAND POWER COMPANY
d/b/a NATIONAL GRID**

By its attorney,



Mark Rielly, Esq.
National Grid USA Service Company, Inc.
d/b/a National Grid
170 Data Drive
Waltham, MA 02451
(781) 902-4208

Dated: December 12, 2024

**COMMONWEALTH OF MASSACHUSETTS
ENERGY FACILITIES SITING BOARD
DEPARTMENT OF PUBLIC UTILITIES**

**NOTICE OF ADJUDICATION AND PUBLIC COMMENT HEARING
New England Power Company d/b/a National Grid
EFSB 24-02/D.P.U. 24-190**

Project Summary and Public Comment Hearing Overview

Notice is hereby given that, pursuant to G.L. c. 164, §§ 69J and 72, New England Power Company d/b/a National Grid (“NEP”), located at 170 Data Drive, Waltham, Massachusetts, 02451 (the “Company”), has filed two related petitions with the Energy Facilities Siting Board (“Siting Board”) and the Department of Public Utilities (“Department”) in connection with its proposal to replace an existing overhead transmission line with a new overhead transmission line (the “Rebuilt Line”) in an existing transmission corridor in Palmer, West Brookfield and Ware, Massachusetts (the “Project”). The Rebuilt Line would continue to operating at 69 kilovolts (“kV”), but be capable of operating at 115 kV, if needed. A description and map of the Project is provided below.

The Siting Board will conduct a public comment hearing with both in person and remote participation options:

Remote attendees: join by clicking (or entering) this link

from a computer, tablet, or smart device. For audio-only participation, attendees can dial in at (646) 558-8656 (not a toll-free number) and then enter the **Webinar ID:**

To provide oral comments during the public comment hearings (in person or on Zoom), please send an email to Yonathan.Mengesha@mass.gov with your name, email address, mailing address, and specify which hearing location, by noon **[date]**. To provide comments by telephone, please leave a voicemail message referencing “EFSB 24-02” at (617) 305-3544 with your name, telephone number, mailing address, and specify which hearing date, by **noon [date]**. Pre-registered commenters will speak first, and other commenters afterwards.

The Siting Board also invites written comments on the Project. Written comments will be most useful to the Siting Board if submitted by **[date]**.

Public Comment Hearing

You are invited to a public comment hearing to learn more about the Project and provide comments on the proposed Project. To build the Project, National Grid needs approval from the Energy Facilities Siting Board (“Siting Board”), part of Massachusetts state government.

The Company will present an overview of the Project. Public officials and members of the public will have an opportunity to ask questions and make comments about the proposed Project. The public comment hearing will be transcribed by a court reporter. A recording of the public comment hearing will be available on the [Siting Board’s YouTube](#) channel after the hearing.

Public Review of the Company’s Petition

A detailed description of the Project is electronically available via the Siting Board’s webpage for the Project: <https://www.mass.gov/info-details/national-grid-replacement-project>. In addition, links to the Company’s petitions, attachments, and analysis are on the webpage, and have been provided to the municipalities of Palmer, West Brookfield and Ware. The Company also maintains a webpage for the Project: www.palmertowareimprovementproject.com.

Hard copies of the Company’s petitions, including all attachments, are available for public inspection at the following locations:

- Energy Facilities Siting Board, One South Station, 3rd floor, Boston, MA 02110
- Municipal/Clerk offices and main public libraries in Palmer, West Brookfield and Ware

Decision on the Project Proposal

The public comment hearing marks the beginning of an official, state-level decision-making process focused on whether the Project should be approved. The Siting Board will make the decision based on the following laws:

- 1) Under G.L. (Massachusetts General Law) c.(chapter) 164, § (section) 69J, the Siting Board will review the Company’s proposed Project to determine whether the Project will provide a reliable energy supply with a minimum impact on the environment at the lowest possible cost.
- 2) Under G.L. c. 164, § 72, the Siting Board will determine whether the proposed Project is necessary, serves the public convenience, and is consistent with the public interest.

Intervention and Participation

Persons or groups who wish to be involved in the Siting Board proceeding, beyond providing comments at the public comment hearing or submitting written comments, may seek either to intervene as a party or to participate as a limited participant. A petition to intervene or participate must also be filed no later than **[date]**, and follow the instructions provided below.

“Intervenor” or “Party” Status: An **intervenor** can participate fully in the evidentiary phase of the proceeding, including the right to participate in evidentiary hearings, file a brief and present comments to the Siting Board on the Tentative Decision, and to appeal a Final Decision.

“Limited Participant” Status: A **limited participant** receives documents during the proceeding and may file a brief and present comments regarding the Tentative Decision to the Siting Board.

Any person seeking intervenor or limited participant status in this proceeding must file by **[date]**. A petition to intervene must demonstrate that the petitioner may be substantially and specifically affected by this proceeding. See below for filing instructions. For more information on the Siting Board’s procedural rules, please see the following link: <https://www.mass.gov/doc/980-cmr-105/download>.

Filing Instructions

Written comments on the Project, or a petition to intervene or participate as a limited participant in this proceeding, must be filed in two places:

First, the comments or petition must be sent to the Siting Board by email - to dpu.efiling@mass.gov - AND to [\[redacted\]](#) - no later than the close of business on **[date]**. The text of the e-mail must specify: (1) the docket number of the proceeding (EFSB 24-02/D.P.U. 24-190); (2) the name of the person or entity submitting the filing; and (3) a brief description of the document. The email should also include the name, title, and telephone number of a person to contact in the event of questions about the filing.

Second, the comments or petition must be sent by email to counsel for the Company, Catherine J. Keuthen, Esq. at Ckeuthen@keeganwerlin.com and Mark Rielly, Esq. at Mark.Rielly@nationalgrid.com.

Accommodation Requests

Reasonable accommodations for people with disabilities (e.g., Braille, large print, electronic files, audio format) are available upon request. Include a complete description of the accommodation you will need and a way we can contact you if we need more information. Please provide as much advance notice as possible. Last minute requests will be accepted, but we may be unable to fulfill the request. Please contact the Department’s ADA coordinator at Andrea.R.Casul@mass.gov.

Spanish interpretation will be provided for the public comment hearings. Additional language interpretation services are available upon request. Include in your request the language required and a way to contact you if we need more information. Requests may be made no later than **[date]**. It may not be possible to accommodate last-minute requests. Contact the Presiding Officer to make a request (contact information below).

Non-discrimination Notice

The EFSB does not discriminate on the basis of race, color, national origin, disability, age, sex, income, ethnicity, class, handicap, religious creed or belief, gender identity, sexual orientation, genetic information, English language proficiency or ancestry in administration of its programs or activities. See the EFSB's Non-Discrimination Notice at: <https://www.mass.gov/info-details/efsb-non-discrimination-notice>.

Contact

For further information about the proceeding, please contact the Presiding Officer at the address or telephone number below:

[], Presiding Officer
Energy Facilities Siting Board
One South Station
Boston, MA 02110
[\[\]](tel:(617)305-xxxx)
(617) 305-xxxx

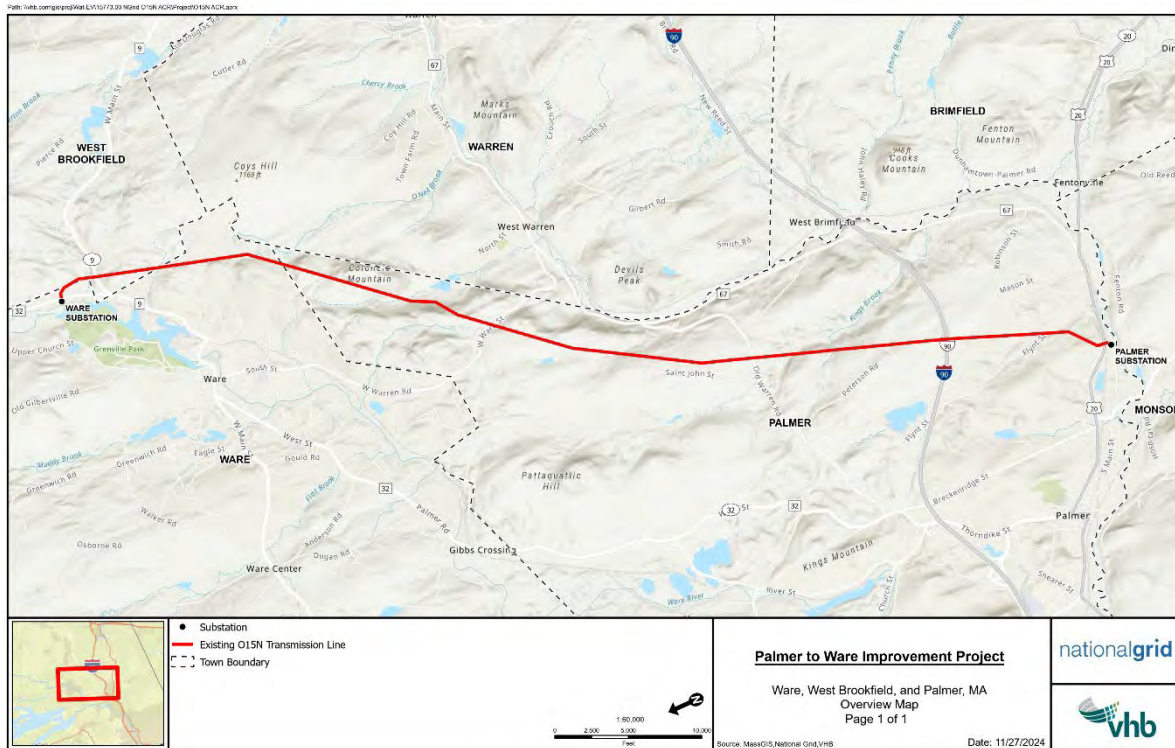
For periodic updates please visit the Siting Board's webpage for this proceeding found at: <https://www.mass.gov/info-details/warwick-to-sterling-replacement-project>.

Project Description

The Company owns and operates an existing transmission line, Line O15N, that extends about 10 miles, from National Grid's Palmer Substation to its Ware Substation (the "Palmer-Ware Line"). National Grid proposes to replace the Palmer-Ware Line and the transmission structures that are holding it up and then remove the old lines and structures.

The Company maintains that the Project is needed because inherent design characteristics and physical deterioration of the existing Palmer-Ware Line have resulted in poor reliability. Rebuilding the existing line will address widespread damage to the existing structures, improve telecommunications between the two substations, and improve reliability.

A general map of the Project area is shown below. An interactive map of the Project is available at the following link: [\[insert\]](#) (Click "CONTINUE AS GUEST" to view the map).



Route Description

The Palmer-Ware Line traverses the Massachusetts towns of Ware, West Brookfield, and Palmer. Beginning at the Palmer Substation at the southern end of the line, the Palmer-Ware Line travels in a northeasterly direction, crossing U.S. Route 20, Flynt Street, Thompson Street, the Massachusetts Turnpike (Interstate 90), Smith Street, Old Warren Road, and West Ware Street for a total of 8.07 miles in Palmer. The Existing Line then crosses into Ware, continuing in a northeasterly direction across Prendiville Road twice and traveling 1.18 miles, before entering West Brookfield. In West Brookfield it continues northeast, crossing West Main Street/MA Route 9 and traveling 0.9 miles before turning westward back into Ware. In Ware the Existing Line travels 0.2 miles and crosses Gilbertville Road/MA Route 32 just before entering the Ware Substation.